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June 2, 2008

BY FAX

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Honorable Robert P. Patterson
United States District Judge
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/3/08

Re: Paul Thompson v. City (Corporation Counsel), et al.
07 Civ. 2831 (RPP)

Your Honor:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants City of New York, New York City Department of Correction, Dorothea Ptomey, Robert Welch, and David Wright, in the above referenced matter. In that capacity, I write in response to plaintiff's letter to the Court dated May 14, 2008, and to respectfully request that the Court schedule a conference, so that the parties may discuss the issues presented in plaintiff's letter.¹ As plaintiff is presently incarcerated and proceeding *pro se*, I have been unable to confer with him regarding this request; therefore, this application is made directly to the Court.

In his May 14, 2008 letter to the Court, plaintiff alleges that defendants have failed to properly respond to his discovery requests, and seeks judicial intervention to compel defendants' responses. Plaintiff's letter, however, fails to cite any specific deficiency in defendants' discovery responses. Plaintiff's letter additionally requests that the Court stay discovery, so that his *pro bono* counsel may have an opportunity to familiarize him or herself with this matter.

As plaintiff has indicated that he has sought legal representation in this matter, and so that plaintiff may be represented by his counsel in all matters relating to this proceeding, defendants respectfully request that the Court order plaintiff to provide the name and address of

¹ A copy of plaintiff's letter, which was received by the undersigned on May 21, 2008, is attached hereto as Exhibit "A."

MEMO ENDORSED

his *pro bono* counsel forthwith, and that the Court schedule a conference, after such time that plaintiff's counsel has been identified, so that parties may resolve any outstanding discovery issues.²

I thank the Court for its time and consideration of this request.

Respectfully submitted,



Amy N. Okekeke
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Paul Thompson, plaintiff *pro se*
07-A-2094
Great Meadow Correctional Facility
Box 51
Comstock, New York 12821-0051 (via first class mail)

Application granted
Telephone Conference will
be held on June 10, 2008 at 9AM
So ordered
T. G. M. & P. Bethune
J.D.F.
6/3/08

² By letter endorsement dated May 16, 2008, the Court previously instructed plaintiff to identify his *pro bono* counsel by name and address. A copy of this letter endorsement is attached hereto as Exhibit "B."

EXHIBIT A

PAUL THOMPSON # 07A2094
P.O. BOX 51 G.M.C.F.
COMSTOCK, N.Y. 12821

May 14, 2008

HONORABLE ROBERT P. PATTERSON
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK
500 PEARL ST. RM. 2550
NEW YORK, N.Y. 10007

RE: PAUL THOMPSON v. CORPORATION COUNSEL, et al., 07 Civ. 2831(RPP)

Your Honor:

I am Pro Se Plaintiff in the above-referenced matter. Plaintiff writes to (1) respectfully request that your Honor permit Plaintiff to move the defendants in an order to compel, and memorandum of law to answer document request and/or interrogatories for each defendant in the above-referenced matter. (2) Respectfully request that the court stay any remaining discovery in this matter pending the court's decision on Plaintiffs' motion, and that due to the recent court's decision in granting the Plaintiffs' motion for Pro Bono counsel, that counsel be allowed to familiarize ~~himself~~ ~~his~~ ~~her~~ ~~himself~~ with the case at bar.

The defendant Corporation Counsel failed to properly provide Plaintiff with the document request in their response dated April 10, 2008 and/or, again, failed to provide Plaintiff with document request, and the response to interrogatories in their response dated April 17, 2008. (see Attached Responses)

Should Your Honor grant Plaintiffs' request for order to compel, and memorandum of law, the Plaintiff propose the following briefing schedule.

- (1) Plaintiffs' motion to be served May 28, 2008
- (2) Defendants' opposition papers to be served by June 10, 2008
- (3) Plaintiffs' reply papers, if any, to be served by June 21, 2008

Thank you for your consideration herein.

SWORN TO ME ON THIS
15th DAY OF May 2008



CURTIS F. POIRIER
Notary Public, State of New York
Qualified in Warren County
No. 01208122732

YOURS TRULY,

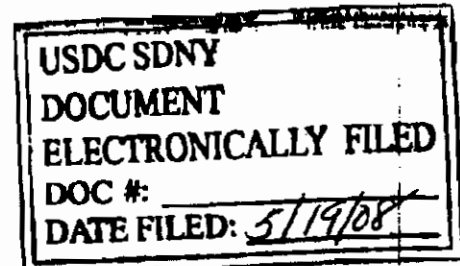


P. THOMPSON

EXHIBIT B

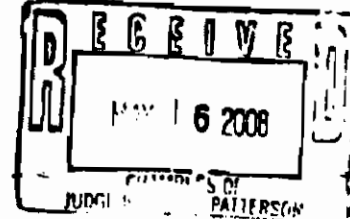
MEMO ENDORSED

PAUL THOMPSON # 07A2094
P.O. BOX 51 G.M.C.F.
COMSTOCK, N.Y. 12821



MAY 13, 2008

HONORABLE ROBERT P. PATTERSON
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK
500 PEARL ST, RMM 2550
NEW YORK, N.Y. 10007



RE: PAUL THOMPSON v. CORPORATION COUNSEL, et al. 07 Civ. 2831(RPP)

YOUR HONOR:

Please accept my apology for not sending this page with my motion to amend the complaint, and I ask that you deny the defendants request from May 8, 2008, regarding a video deposition conference, being I was recently granted Pro Bono Counsel : I would like to wait on Counsels advice. I thank you for your time and effort in thsi matter.

yours truly,

Paul Thompson
P. THOMPSON PROSE

*Application granted.
Plaintiff is to name Pro Bono Counsel and address
by return mail. Defense is to delay deposition
until June 1 2008 or thereabout*

*To advised
R. P. Patterson to USDC
5/15/08*